

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re

CASEY R. INGELS,

Debtor.

Case No. 14-10421-MLB

JOHN S. PETERSON, as Bankruptcy Trustee,

Plaintiff,

Adversary No. 14-01387-MLB

vs.

CASEY R. INGELS,

Defendant.

EX PARTE MOTION FOR ORDER
SHORTENING TIME ON DEFENDANT'S
MOTION IN LIMINE

Casey R. Ingels ("Debtor" and/or "Defendant"), by and through counsel, J. Todd Tracy, Jamie McFarlane, and The Tracy Law Group PLLC, moves this court for an Order Shortening Time For Hearing on Defendant's Motion in Limine (the "Motion"). The Motion is based on the following grounds:

1. The present adversary is set for trial on June 8, 2015.
2. Pursuant to this court's February 23, 2015 Scheduling Order, trial briefs and motions in limine must be filed on or before June 1, 2015.

EX PARTE MOTION FOR ORDER SHORTENING
TIME ON DEFENDANT'S MOTION IN LIMINE - 1

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1 3. Plaintiff is the bankruptcy trustee in Debtor's main bankruptcy case.

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3 4. On May 19th, 2015, the Plaintiff filed a Prehearing Statement. In his
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5 Prehearing Statement, Plaintiff lists himself as a witness who will testify at the June 8th trial
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7 despite the fact that he is also the attorney for the Plaintiff.
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10 5. Local Rule 9013(d)(2)(E) provides that emergency motions shall be
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12 scheduled for hearing with such notice as the Court shall prescribe.
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14 6. Pursuant to Local Rule 9013(d)(3), orders to shorten time shall be the
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16 exceptions to the rule, and will be granted only upon a showing of exigent or exceptional
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18 circumstances and may be granted ex parte at the Court's discretion.
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20 7. Here, exigency exists to warrant shortening time on Defendant's Motion in
21
22 Limine as trial is just over a week away and the court's determination of Defendant's Motion
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24 will greatly affect the trial and the evidence that may be proffered.
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26 8. According to the foregoing, Mr. Ingels respectfully requests that Defendant's
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28 Motion in Limine be heard at the Court's earliest convenience during the week of June 1,
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30 2015, and as the parties' schedules permit. Mr. Ingels has no objection to permitting Mr.
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32 Peterson to appear telephonically at any hearing.
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35 DATED this 1st day of June 2015.
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38
39 THE TRACY LAW GROUP PLLC
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41 By /s/ Jamie McFarlane
42 J. Todd Tracy, WSBA #17342
43 Jamie McFarlane, WSBA #41320
44 Attorneys for Debtor/Defendant
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EX PARTE MOTION FOR ORDER SHORTENING
TIME ON DEFENDANT'S MOTION IN LIMINE - 2

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